

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

JOHN ANTHONY CASTRO )  
12 Park Place, Mansfield, TX 76063 )  
 )  
 Plaintiff, ) Case No. 2:23-cv-00598  
v. ) The Honorable Irene C. Burger  
 )  
 SECRETARY OF STATE ANDREW )  
 WARNER and DONALD JOHN TRUMP, )  
 )  
 Defendants. )

**AFFIDAVIT OF CAMPAIGN ACTIVITIES PRIOR TO CASE FILING**

I, John Anthony Castro, declare as follows:

1. I am the plaintiff in the present case, a U.S. citizen, and an FEC-registered Republican primary presidential candidate (Candidate FEC ID Number P40007320) for the 2024 Presidential Election.
2. I am a ballot-placed Republican Primary Presidential candidate in Arizona, New Hampshire, and Nevada.
3. My ballot placement in South Carolina is currently in dispute and subject to federal litigation wherein the U.S. Magistrate has recommended my claim that their \$50,000 filing fee is unconstitutionally burdensome, which establishes the seriousness with which I am approaching my candidacy.
4. The filing period for West Virginia is January 8 – 26. As such, I cannot legally file my Declaration of Candidacy yet and waiting to file this civil action until then is

unreasonable as it risks the issues becoming moot if the Court does not have sufficient time to rule on the issues.

5. Nevertheless, the filing fee is only \$2500. Moreover, the Verified Complaint, Verification Form on PDF Page 35 of 35, clearly states “I intend to... appear on the 2024 Republican primary ballot in this state.” Fed. R. Civ. P. 8(d)(3) permits multiple claims for standing “regardless of consistency.” Nevertheless, I am clarifying my intent with regard to West Virginia. Between January 8 – 26, I will pay the \$2500 and file my Declaration of Candidacy. In accordance with the U.S. Supreme Court’s decision in *Golden v. Zwickler* and the Fourth Circuit’s ruling in *Bryant v. Woodall*, this stated intent suffices since this trifile is real and imminent.
6. I incurred expenses associated with campaigning to target voters in this state **prior** to filing this civil action. In particular, I have incurred monthly hosting expenses for my Presidential campaign website, [www.JohnCastro.com](http://www.JohnCastro.com), which amount to about \$774 per month. These expenses were incurred **before** this case was filed. In fact, I have been incurring these expenses since I first sued the Federal Election Commission in January 2022 to disqualify Trump. In addition, I have spent thousands of dollars cultivating a genuine and active political following on social media, especially X, where I have 39,300 followers, including hundreds from the state of this state. To achieve this following, I utilized an expensive service provided by PhantomBusters to auto-follow thousands of politically active Twitter users, including voters in West Virginia.
7. I launched my own online show called the Truth Addict, which has been viewed by thousands of voters in this state.

8. I have been recognized by every major news outlet as a candidate, albeit a long-shot, as well as a ballot-placed candidate in states that are critical to my strategy.

9. I have raised \$398 from 17 small donors *prior* to the case being filed.

10. I have established that I am engaged in digital campaign activities, digital campaign activities targeting voters in this state, evidenced media coverage both in this state and nationally, evidenced campaign expenses, and evidenced campaign contributions.

11. Pursuant to 28 U.S.C. § 1746 and state, I verify under penalty of perjury that the entirety of the foregoing document is true and correct.

Executed on November 30, 2023.

/s/ John Anthony Castro  
John Anthony Castro